

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

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DEMETRIC DIAZ, OWEN DIAZ, and )  
LAMAR PATTERSON, )  
Plaintiffs, ) CASE NO.  
vs. ) 3:17-CV-06748-WHO  
TESLA, INC. dba TESLA MOTORS, )  
INC.; CITISTAFF SOLUTIONS, )  
INC.; WEST VALLEY STAFFING )  
GROUP; CHARTWELL STAFFING )  
SERVICES, INC.; and DOES 1-50, )  
inclusive, )  
Defendants. )  
- - - - -

DEPOSITION OF MICHAEL JOHN WHEELER

WEDNESDAY, JUNE 12, 2019

Reported by:

BY: MELINDA M. SELLERS, CSR# 10686, RMR, CRC, CRR, CCRR

MICHAEL JOHN WHEELER

June 12, 2019

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Deposition of MICHAEL JOHN WHEELER, taken on  
behalf of PLAINTIFFS, at 180 Grand Ave., Suite 1380,  
Oakland, California, commencing at 12:18 p.m.,  
WEDNESDAY, JUNE 12, 2019, before Melinda M. Sellers,  
Certified Shorthand Reporter No. 10686, pursuant to  
Notice.

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MICHAEL JOHN WHEELER

June 12, 2019

1 APPEARANCES OF COUNSEL:

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MICHAEL JOHN WHEELER

June 12, 2019

1 APPEARANCES OF COUNSEL (CONTINUED):  
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9  
10 ALSO PRESENT:  
11 SAJA SPEARMAN, INTERN/VIDEOGRAPHER

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1     **factory.**

2           Q.     Okay.

3           A.     For instance, there was an incident where  
4     the cart I told you about I drove around as a  
5     supervisor, someone put feces on my seat, which I  
6     later then sat in because I don't check my seat  
7     before I sit down because that's the last thing I  
8     was expecting to be there.

9           Q.     Okay. Let me -- let's go incident by  
10    incident.

11           So you told Owen about an incident where  
12    someone had put some feces in your seat; is that  
13    right?

14           A.     I told everyone about that incident. I  
15    sent out a very long email to Victor and anyone on  
16    that thread, asking -- and security as well, asking  
17    for them to check the cameras because this is  
18    unacceptable.

19           Q.     Right. Do you think that someone put the  
20    feces -- strike that.

21           This cart was your cart?

22           A.     This was my cart.

23           Q.     Okay. So people would -- people who you  
24    worked with would know that it was your cart?

25           A.     Everyone knew it was my cart.

MICHAEL JOHN WHEELER

June 12, 2019

1 STATE OF CALIFORNIA )

2 ) ss

3 COUNTY OF CALAVERAS )

4 I hereby certify that the witness in the  
5 foregoing deposition of MICHAEL JOHN WHEELER was by  
6 me duly sworn to testify to the truth, the whole  
7 truth, and nothing but the truth in the  
8 within-entitled cause; that said deposition was taken  
9 at the time and place herein named; that the  
10 deposition is a true record of the witness's  
11 testimony as reported by me, a duly certified  
12 shorthand reporter and a disinterested person, and  
13 was thereafter transcribed into typewriting by  
14 computer.

15 I further certify that I am not interested  
16 in the outcome of the said action, nor connected  
17 with, nor related to any of the parties in said  
18 action, nor to their respective counsel.

19 IN WITNESS WHEREOF, I have hereunto set my  
20 hand this 24th day of June, 2019.

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MELINDA M. SELLERS, CSR NO. 10686

25 STATE OF CALIFORNIA